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May 17, 2013

**BY ELECTRONIC FILING**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: Numbering Plan Proposal of SmartEdgeNet, LLC**  
(WC Docket No. 13-97, WC Docket No. 04-36, WC Docket No. 07-243,  
CC Docket No. 95-116, CC Docket No. 01-92, WC Docket No. 10-90,  
CC Docket No. 99-200)

Dear Ms. Dortch:

Pursuant to paragraph 101 of the Commission's Notice of Proposed Rulemaking, Order and Notice of Inquiry in the above-referenced dockets that was released on April 18, 2013, SmartEdgeNet, LLC, as an interconnected VoIP provider with a pending petition for a limited waiver of section 52.15(g)(2)(i) of the Commission's rules, hereby submits its numbering plan proposal.

Please direct any correspondence concerning this matter to the undersigned counsel.

Sincerely,

DAVIS WRIGHT TREMAINE LLP

A handwritten signature in blue ink, appearing to be 'R. Lowe', written over the printed name.

Randall B. Lowe

Attachments

Anchorage  
Bellevue  
Los Angeles

New York  
Portland  
San Francisco

Seattle  
Shanghai  
Washington, D.C.

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## Numbering Plan Proposal of SmartEdgeNet, LLC ("SEN")

- A. The following are the LATAs in which SEN would like to have numbers directly assigned, the amount of numbers and the number of ports:

LATA 45807 (Celebration FL)	Direct allocation 1,000 block 900 for new customers
LATA 46017 (Keys FL)	Direct Allocation 1,000 block, Port in 200 TNs
LATA 552 (Dallas TX)	Direct Allocation 1,000 block, Port In 250 TNs

SEN is requesting number blocks in three LATAs in order to properly test routing multiple LRNs are required.

- B. The following is a description of the phase-in process to implement the trial:

### *Phase I - Initial Setup*

1. Acquire an OCN from NECA
2. Setup, test and turn up of SIP trunks with Neutral Tandem (Inteliquent)
3. Acquire direct allocations in desired LATAs from NANPA
4. Populate LERG with LRNs for assigned T-Blocks, and nominate Neutral Tandem as the "Local Tandem" and "Access Tandem" for each T-Block LRN

### *Phase II - Testing and Verification of NANPA assigned T-Blocks*

1. Test and turn up of newly assigned T-Block TNs with friendly test sites in each trial LATA.
2. Test calls from various markets, including ILECs, cellular and cable carriers, to verify routing and call completion.
3. Test E911 services
4. Mitigate any issues discovered in this phase

### *Phase III - Testing and Verification of LNP*

1. Initiate LNP
2. Upon LNP completion, update LERG with appropriate LRN
3. Test calls from various markets including ILECs, cellular and cable carriers, to verify routing and call completion
4. Test E911 services
5. Mitigate any issues discovered in this phase

*Phase IV - Testing and Verification of live customers - NEW TNs* (This phase will only be implemented once phases 1-3 have been extensively tested and their success validated.)

1. Test and turn up of newly assigned T-Block TNs with customers in each trial LATA.
2. Test calls from various markets, including ILECs, cellular and cable carriers to verify routing and call completion.
3. Test E911 services

4. Mitigate any issues discovered in this phase

*Phase V - Testing and Verification live customers – LNP* (This phase will only be implemented once phases 1-3 have been extensively tested and their success validated.)

1. Initiate LNP
2. Upon LNP Completion, update LERG with applicable LRN
3. Test calls from various markets including, and most importantly ILecs, to verify routing and call completion.
4. Test E911 services
5. Mitigate any issues discovered in this phase

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Numbering Policies for Modern Communications	)	WC Docket No. 13-97
	)	
IP-Enabled Services	)	WC Docket No. 04-36
	)	
Telephone Number Requirements for IP-Enabled Services Providers	)	WC Docket No. 07-243
	)	
Telephone Number Portability	)	CC Docket No. 01-92
	)	
Developing a Unified Intercarrier Compensation Regime	)	WC Docket No. 10-90
	)	
Connect America Fund	)	CC Docket No. 99-200
	)	
Numbering Resource Optimization	)	
	)	
Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources	)	
	)	
Petition of TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of the Commission's Rules	)	
	)	

**DECLARATION OF TERRENCE M. PECK**

1. My name is Terrence M. Peck. I am Chief Executive Officer ("CEO") of SmartEdgeNet, LLC ("SEN"). This Declaration supports the numbering plan proposal filed by SEN in the above-captioned proceeding.
2. In my capacity as CEO of SEN, I have the authority to make the certification of compliance set forth below.

3. On behalf of SEN, I hereby certify that SEN will comply with the terms and conditions of the waiver granted to SEN in the *VoIP Numbering Trial Order* in this proceeding.<sup>1</sup>

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 5/17/13

Terence M. Pask  
Name

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<sup>1</sup> *Numbering Policies for Modern Communications, et al.*, Notice of Proposed Rulemaking, Order and Notice of Inquiry, ¶ 101 WC Dkt. 13-97, *et al.*, FCC No. 13-51 (April 18, 2013).